



State of Utah
 DEPARTMENT OF NATURAL RESOURCES
 DIVISION OF OIL, GAS AND MINING

Michael O. Leavitt
 Governor

Ted Stewart
 Executive Director

James W. Carter
 Division Director

355 West North Temple
 3 Triad Center, Suite 350
 Salt Lake City, Utah 84180-1203
 801-538-5340
 801-359-3940 (Fax)
 801-538-5319 (TDD)

May 25, 1993

Mr. David Pearce
 Sunnyside Cogeneration Associates
 P.O. Box 58087
 Salt Lake City, Utah 84158-0087

Dear Mr. Pearce:

Re: Conditional Approval of Stipulation #17, Sunnyside Cogeneration Associates, Coarse Refuse at the Sunnyside Mine, ACT/007/035, Folder #3, Carbon County, Utah

The above-noted stipulation to the permit has been reviewed (see attached memo). The water quality monitoring program as described in the submittal is within the current guidelines established by the Division. This stipulation can be approved with the following conditions: 1) The tables must be numbered and incorporated into the Table of Contents and hydrology section of the permit, 2) The table on page 4 of the submittal describing the baseline water monitoring station must be corrected to describe the location as the **Coarse Refuse Seep at Source (CRS)** and the **Coarse Refuse Seep at Boundary (CRB)**, not as the Coarse Refuse Toe Sediment Pond (Source) and the Coarse Refuse Toe Sediment Pond (boundary), and 3) A schedule and procedure must be developed for monitoring the piezometers located in the south embankment of the East Slurry Cell.

Please submit all changes to the plan by noting them in the cover letter to include the amended pages and maps for insertion into the permit package. Please submit the conditions noted above by June 25, 1993. If you have any questions, please call me.

Sincerely,


 Pamela Grubaugh-Littig
 Permit Supervisor

Enclosure





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May 21, 1993

TO: Pamela Grubaugh-Littig, Permit Supervisor

FROM: Ken Wyatt, Senior Reclamation Hydrologist *KWJ*

RE: Permit Stipulation #17 Review, Sunnyside Cogeneration Associates, Sunnyside Refuse Pile, ACT/007/035, Folder #2, Carbon County, Utah

SYNOPSIS

On April 26, 1993, Sunnyside Cogeneration Associates submitted a response to the Division's review of a previous submittal to permit stipulation number 17. This memo will review this response.

ANALYSIS

Stipulation 17 required the operator to: "Within 30 days of permit approval, the permittee must submit a schedule for each of the water monitoring sites to be sampled with a list of the parameters to be analyzed at each site and the schedule for sampling as baseline and operational parameters."

The previous response to stipulation 17 was to submit plates 7-2 and 7-3. Plate 7-3 shows general locations of permitted mine discharge locations. The UPDES permit #UT0024759 includes six mine discharge points in the SCA permit area as listed below. The operator has committed to monitor these in accordance with the Division's operational parameter list:

<u>POINT</u>	<u>LOCATION</u>	<u>LATITUDE</u>	<u>LONGITUDE</u>
004	Clear Water Pond	39° 32' 52"	110° 23' 11"
007	Rail Cut Pond	39° 32' 14"	110° 23' 48"
008	Old Coarse Refuse Pond	39° 32' 20"	110° 23' 3"
009	Pasture Pond	39° 32' 36"	110° 23' 29"
012	Coarse refuse Toe	39° 32' 28"	110° 23' 58"
016	Borrow Area Pond	39° 32' 45"	110° 23' 45"



Comparing the parameters submitted with those found in the Division guidelines revealed that all of the parameters in the guidelines were listed as required. Monitoring frequency is described in the MRP which commits to monitoring field parameters twice per month and collecting quality samples on a quarterly basis. This is committed to in the tables submitted with this response. Plate 7-2 shows general locations of baseline water monitoring points as described in the tables submitted. These are listed below:

<u>POINT</u>	<u>LOCATION</u>
CRS	Coarse Refuse Toe Sediment Pond (Source)
CRB	Coarse Refuse Toe Sediment Pond (Boundary)
F-2	Icelander Columbia-Dugway Spring 1350
ICE-1	Icelander Creek
Well	East Carbon City Well (Municipal Use-groundwater)

The two sites associated with the Coarse Refuse pile should be described in the location column of the table in the middle of page 4 as the **Coarse Refuse Seep at Source (CRS)** and the **Coarse Refuse Seep at Boundary (CRB)** and not as the Coarse Refuse Toe Sediment Pond (Source) and the Coarse Refuse Toe Sediment Pond (boundary). This will need to be corrected prior to incorporation into the mine plan.

Henry Sauer and Hugh Klein who inspect the Sunnyside Coal Company and the Sunnyside Cogeneration Associates properties respectively have indicated that Sunnyside Coal Company was permitted and required to monitor the piezometers located in the south embankment of the East Slurry cell. This monitoring responsibility should have transferred to the Sunnyside Cogeneration Associates permit. This requirement was overlooked and should be included in the SCA permit and monitoring schedule.

RECOMMENDATION

The water quality monitoring program as described in this submittal is within the current guidelines established by the Division and as described in the MRP. I recommend that the response to stipulation 17 be conditionally approved with the following corrections in the final copies to be incorporated into the MRP.

1. The operator needs to number the tables and incorporate them into the table of contents and the hydrology section of the SCA permit.

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2. The table on page 4 of the submittal describing the baseline water monitoring stations should be corrected to describe the location as the **Coarse Refuse Seep at Source (CRS)** and the **Coarse Refuse Seep at Boundary (CRB)** and not as the Coarse Refuse Toe Sediment Pond (Source) and the Coarse Refuse Toe Sediment Pond (boundary).
3. The operator will need to develop a schedule and procedure for monitoring the piezometers located in the south embankment of the East Slurry Cell.